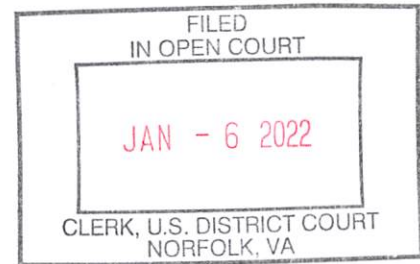


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

BRETT IAN ANDREWS,

Defendant.

CRIMINAL NO. 2:22-cr-5

18 U.S.C. § 2422(b)
Attempted Coercion and Enticement
of a Minor
(Counts 1 & 2)

18 U.S.C. § 1470
Attempted Transfer of Obscene Material
to a Minor
(Counts 3 & 4)

18 U.S.C. §§ 1467, 2428
Criminal Forfeiture

INDICTMENT

January 2022 Term -- At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about August 1, 2021, in Virginia Beach, in the Eastern District of Virginia, and elsewhere, defendant BRETT IAN ANDREWS, using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, namely Virginia Code § 18.2-374.3.

(In violation of Title 18, United States Code, Section 2422(b).)

COUNT TWO

On or about December 12, 2021, in Virginia Beach, in the Eastern District of Virginia, and elsewhere, defendant BRETT IAN ANDREWS, using a facility and means of interstate and

foreign commerce, did knowingly attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, namely Virginia Code § 18.2-374.1 and § 18.2-370.

(In violation of Title 18, United States Code, Section 2422(b).)

COUNT THREE

On or about August 1, 2021, in Virginia Beach, in the Eastern District of Virginia and elsewhere, defendant BRETT IAN ANDREWS did, by a facility and means of interstate and foreign commerce, namely the Internet, knowingly attempt to transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

(In violation of Title 18, United States Code, Section 1470.)

COUNT FOUR

On or about December 12, 2021, in Virginia Beach, in the Eastern District of Virginia and elsewhere, defendant BRETT IAN ANDREWS did, by a facility and means of interstate and foreign commerce, namely the Internet, knowingly transfer and attempt to transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

(In violation of Title 18, United States Code, Section 1470.)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendant, BRETT IAN ANDREWS, is hereby notified:

A. Upon conviction of the violation alleged in Counts One or Two of this Indictment, the defendant shall forfeit to the United States:

1. Any property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the violation;

2. Any property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the violation.

B. Upon conviction of any of the violations alleged in Counts Three or Four of this Indictment, the defendant shall forfeit to the United States:

1. Any obscene material produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 1460 *et seq.*;

2. Any property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offense;

3. Any property, real and personal, used or intended to be used to commit or to promote the commission of the offense.

C. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

D. The property subject to forfeiture includes, but is not limited to, items seized from the defendant in or around December 2021, including:

Iphone 11 Pro Max Model # MWFR2LL/A and SN: F2LD34VEN70G

(In accordance with Title 18, United States Code, Sections 1467 and 2428; and Title 21, United States Code, Section 853(p).)

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

United States of America v. BRETT IAN ANDREWS
2:22CR 5

A TRUE BILL:

REDACTED COPY

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By: _____


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